

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

JON HALL,)	
)	
Petitioner,)	
)	
vs.)	No. 05-01199-JDT
)	
RICKY BELL, Warden, Riverbend)	
Maximum Security Institution,)	
)	
Respondent.)	

MOTION FOR LEAVE TO SERVE SUBPOENAS

Pursuant to Rule 6 of the Rules Governing Section 2254 Cases and the Sixth, Eighth, and Fourteenth Amendments to the United States Constitution, death-sentenced habeas petitioner Jon Hall respectfully requests leave to serve subpoenas requiring production of

(1) documents in the possession, custody, or control of the District Attorney's Office for Tennessee's 26th Judicial District respecting the July 29, 1994, murder of Billie Hall;

(2) documents in the possession, custody, or control of the Tennessee Bureau of Investigation respecting the Billie Hall murder;

(3) documents in the possession, custody, or control of the Medical Examiner's Office, including autopsy photographs and x-ray photographs, respecting the Billie Hall post-mortem examination ;

(4) documents in the possession, custody, or control of the Henderson County, Tennessee, Sheriff's Department respecting the Billie Hall murder; and

(5) documents in the possession, custody, or control of the Madison County, Tennessee,

Sheriff's Department respecting the Billie Hall murder.

Mr. Hall files contemporaneous with this motion a memorandum in support.

On October 10, 2006, undersigned counsel spoke with counsel for the State, Elizabeth Ryan. Ms. Ryan informed that the State would not agree to the relief Mr. Hall seeks in this motion.

WHEREFORE, Jon Hall respectfully requests that this Court:

- (1) Grant him leave to serve the above-described subpoenas; and
- (2) Order such other relief as this Court deems just.

Respectfully Submitted,

Paul R. Bottei
Christopher M. Minton
Assistant Federal Public Defender

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By: /s/ Christopher M. Minton

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed electronically. Notice of this Filing will be sent by operation of this Court's electronic filing system to counsel for respondent, Elizabeth Ryan, Esq., 425 Fifth Avenue North, Nashville, Tennessee 37243, on this the 10th day of October, 2006.

/s/ Christopher M. Minton

